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7 *Attorneys for Defendant*
8 *Freeman Expositions, LLC*
Improperly Named The Freeman Company, LLC

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

13 JAMES ROUSHKOLB,

14 Plaintiff,

15 vs.

16 THE FREEMAN COMPANY, LLC, a
17 Domestic Corporation;
18 EMPLOYEE(S)/AGENT(S) DOES I-X; and
19 ROE CORPORATIONS XI-XX, Inclusive,
20 Defendants.

Case No. 2:19-cv-02084-JCM-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
DEFENDANT'S RESPONSE TO
PLAINTIFF'S COMPLAINT
(Second Request)**

21 IT IS HEREBY STIPULATED by and between Plaintiff, James Roushkolb ("Plaintiff"),
22 through his counsel The Gabroy Law Offices, and Defendant Freeman Expositions, LLC improperly
23 named as The Freeman Company, LLC ("Defendant"), through its counsel Jackson Lewis P.C.,
24 that Defendant shall have up to and including **Tuesday, January 21, 2020**, in which to
25 respond to Plaintiff's Complaint. This Stipulation is submitted and based upon the following:

26 1. That Defendant's answer or response in the United States District Court for the
27 District Nevada is currently due on January 7, 2020.

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1 2. That this is the second request for an extension of time for Defendant to respond to
2 Plaintiff's Complaint.

3 3. That such an extension is necessary because defense counsel requires additional
4 time to investigate facts that will allow for an informed response to the pending Complaint.

5 4. That this request is made in good faith and not for the purpose of delay.

6 5. That nothing in this Stipulation, nor the fact of entering to the same, shall be
7 construed as waiving any claim and/or defense held by any party.

8 Dated this 2nd day of January, 2020.

9 GABROY LAW OFFICES

JACKSON LEWIS P.C.

10
11 /s/ Christian Gabroy
12 Christian Gabroy
13 Nevada State Bar No. 8805
14 GABROY LAW OFFICES
15 The District at Green Valley Ranch
16 170 South Green Valley Parkway, Suite 280
17 Henderson, Nevada 89012

11 /s/ Lynne K. McChrystal
12 Paul T. Trimmer
13 Nevada State Bar No. 9291
14 Lynne K. McChrystal
15 Nevada State Bar No. 14739
16 300 S. Fourth Street, Suite 900
17 Las Vegas, Nevada 89101

15 Attorneys for Plaintiff

Attorneys for Defendant

17 **ORDER**

18 IT IS SO ORDERED:

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20 
21 United States Magistrate Judge

22 Dated: January 3, 2020
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4825-7607-0320, v. 1